

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

VOLKSWAGEN AG, VOLKSWAGEN OF
AMERICA, INC. and BUGATTI
INTERNATIONAL, S.A.

Plaintiffs and Counterclaim Defendants,

v.

THE BUGATTI, INC.

Defendant and Counterclaim Plaintiff.

Civil Action No. 05-11067-PBS

DECLARATION OF MICHAEL D. WHITE, ESQ.

I am counsel to the law firm Blank Rome LLP and one of the counsel for Plaintiffs Volkswagen AG, Volkswagen of America, Inc. and Bugatti International, S.A. in this case.

I submit this Declaration in support of Plaintiffs' Memorandum in Opposition to The Bugatti, Inc.'s Motion to Compel Responses to Outstanding Discovery Requests.

1. Attached hereto as Exhibit 1 is a true and correct copy of Supercars, Driving the Dream, A. Phillips, 2006 (BI 107463 - BI 107473).
2. Attached hereto as Exhibit 2 is a true and correct copy of *Car and Driver*, November 2005, pp. 58-63 (BI 100000-BI 100006).
3. Attached hereto as Exhibit 3 is a true and correct copy of *eVO*, December 2005, pp. 80-93 (BI 102976 - BI 102990).
4. Attached hereto as Exhibit 4 is a true and correct copy of *Car*, October 2005, pp. 90-102 (BI 100007 - BI 100019).

5. Attached hereto as Exhibit 5 is a true and correct copy of *Road & Track*, January 2006, pp. 60-68 (BI 102991 - BI 103000).
6. Attached hereto as Exhibit 6 is a true and correct copy of *Automobile*, November 2005, pp. 59-66 (BI 100020 - BI 100028).
7. Attached hereto as Exhibit 7 is a true and correct copy of "Back Again," *Cigar Aficionado Online*, Spring 1995 (BI 107474 - BI 107481).
8. Attached hereto as Exhibit 8 is a true and correct copy of EB 110, the first U.S. Bugatti dealers (BI 107462).
9. Attached hereto as Exhibit 9 is a true and correct copy of Bugatti Automobili S.P.A. EB 110 Brochure (BI 101890 - BI 101893).
10. Attached hereto as Exhibit 10 a true and correct copy of a webpage from O'Gara Coach Company, <www.rollsroycebeverlyhills.com> (BI 107628).
11. Attached hereto as Exhibit 11 is a true and correct copy of *Motor Trend Classic*, January/February 2006 O'Gara Coach Company Advertisement (BI 107642 - BI 107643).
12. Attached hereto as Exhibit 12 is a true and correct copy of a letter dated February 1, 2006 from S. Flohr to G. Haight.
13. Attached hereto as Exhibit 13 is a true and correct copy of an email exchange dated February 16, 2006 between S. Flohr and G. Haight.
14. Attached hereto as Exhibit 14 is a true and correct copy of a letter dated March 2, 2006 from S. Flohr to G. Haight.

15. Attached hereto as Exhibit 15 is a true and correct copy of a February 28, 2006 *Miami Herald* article entitled "Driving a \$1.4 Million Car, Who Needs a Cup-Holder?" (BI 107740 - BI 107742).
16. Attached hereto as Exhibit 16 is a true and correct copy of the *Robb Report*, December 2005, pp. 37, 39, 139-143. (BI 100110 - BI 100117).
17. Attached hereto as Exhibit 17 is a true and correct copy of 2000 Pebble Beach Concours d'Elegance Brochure (BI 101661 - BI 101662).
18. Attached hereto as Exhibit 18 is a true and correct copy of 2001 Catalog Cover (BI 107085).
19. Attached hereto as Exhibit 19 is a true and correct copy of <www.bugatti.com> webpage showing picture of Bugatti Veyron (BI 00803 - BI 00810).
20. Attached hereto as Exhibit 20 is a true and correct copy of <www.bugatti.com> webpage with Veyron link (BI 00810 - BI 00811).
21. Attached hereto as Exhibit 21 is a true and correct copy of a letter dated January 30, 2006 from S. Flohr to G. Haight.
22. Attached hereto as Exhibit 22 is a true and correct copy of Collective Exhibit of acquisition negotiations/due diligence documents (BI 107541 - BI 107608).

Signed under the pains and penalties of perjury this 10th day of March, 2006.



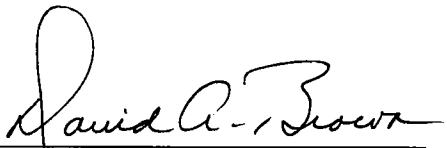
Michael D. White

Dated: March 10, 2006

CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2006 I served upon the below-named counsel the foregoing Declaration of Michael D. White, Esq. by hand:

H. Joseph Hameline, BBO # 218710
Geri L. Haight, BBO # 638185
Philip J. Catanzano, BBO # 654873
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